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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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| Abilio Hernandez,<br><br>Plaintiff,<br><br>v.<br><br>Allied Collection Services, Inc.,<br><br>Defendant. | Case No.: 2:19-cv-00291-JCM-VCF<br><br><b>Stipulation for extensions of time to<br/>respond to motions [ECF Nos. 18,<br/>20]</b><br><br><b>(First Request)</b> |
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Abilio Hernandez (“Plaintiff”) and Allied Collection Services, Inc. (“Defendant”), by and through their respective counsel, hereby submit this stipulation for extensions of time for the parties to respond to Plaintiff’s motion for summary judgment, ECF No. 18, and Defendant’s motion for an order withdrawing admissions under FRCP 36(b), ECF No. 20. Plaintiff’s response is currently due on June 27, 2019. ECF No. 20. Defendant’s response is currently due on July 3, 2019. ECF No. 18.

The parties are actively engaged in discussions that may potentially resolve or limit the scope of these pending motions. The parties therefore jointly request an extension of time to respond to the pending motions. The Parties in good faith stipulate to allow additional time to respond to these motions. This is the first

request for an extension of this deadline.

The Parties therefore stipulate that:

- (1) Plaintiff's response to Defendant's motion for an order withdrawing admissions under FRCP 36(b), ECF No. 20, shall be due on **July 11, 2019**; and
- (2) Defendant's response to Plaintiff's motion for summary judgment, ECF No. 18, shall be due **July 17, 2019**.

DATED this 27th day of June 2019.

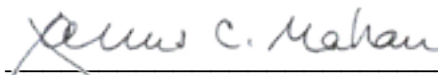
**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind  
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**CARLSON & MESSER LLP**

By: /s/ J. Grace Felipe  
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*Attorneys for Defendant*  
*Allied Collection Services, Inc.*

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

June 28, 2019  
DATED: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on June 27, 2019, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

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